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UBER TECHNOLOGIES, INC.
18 and OTTOMOTTO LLC

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,
27 Defendants.
28

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
JOINT RESPONSES TO COURT'S
QUESTIONS 3 AND 4 FOR
FURTHER HEARING ON MOTION
TO STRIKE ASSERTED TRADE
SECRET NUMBER 96**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Joint Responses to Court's Questions 3 and 4 for Further Hearing on Motion to Strike Asserted Trade Secret Number 96.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Joint Responses to Court's Questions 3 and 4 for Further Hearing on Motion to Strike ("Joint Responses")	Highlighted Portions	Plaintiff (green)
Exhibit A	Entirety	Plaintiff Defendants

3. The entirety of Exhibit A contains highly confidential information regarding the technical details of Uber's LiDAR systems. This highly confidential information is not publicly known, and its confidentiality is strictly maintained. I understand that disclosure of this information could allow competitors to obtain a competitive advantage over Uber by giving them details into the technical features of Uber's LiDAR sensors, such that Uber's competitive standing could be significantly harmed.

4. The green-highlighted portions of the Joint Responses and the entirety of Exhibit A contains information that has been designated "Highly Confidential – Attorneys' Eyes Only" by Waymo in accordance with the Patent Local Rule 2-2 Interim Model Protective Order ("Protective Order"), which the parties have agreed governs this case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in accordance with Paragraph 14.4 of the Protective Order.

